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February 22, 2008

BY FAX

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

2/22/2008
UNITED STATES DISTRICT JUDGE

Re: United States v. Antone White and Marilenny Santos
07 Cr. 570 (NRB)

Dear Judge Buchwald:

This is to request an extension of the time to file written motions on behalf of the above-captioned defendants. Counsel for co-defendant White joins in this request, and the Government has consented to this request.

Based in part on the Government's expectation that it would produce the last of the discovery by Wednesday, January 23, 2008, the Court moved the date for the filing of defense motions from January 25, 2008, to February 22, 2008.

Despite the best efforts of Government counsel, final discovery was provided to the defense in early February. Defense counsel seek to review such discovery before filing motions. In addition, the parties are attempting to negotiate dispositions and arrange a co-defendant meeting. For these reasons, we respectfully request a new date of March 24, 2008, by which motions, if any, are to be filed. Defense counsel consent to the further exclusion of time.

Respectfully submitted,

Bruce McIntyre
BRUCE MCINTYRE
Attorney for Marilenny Santos

2/26/08
Bruce
Marilenny Santos

cc: AUSA Antonia M. Apps
Harry H. Rimm, Esq.